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Attorney for Debtors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

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IN RE:

Case No. 21-14978-abl
(Chapter 11)

SILVER STATE BROADCASTING,
LLC,

Jointly Administered with:

Debtor.

21-14979-abl	Golden State Broadcasting, LLC
21-14980-abl	Major Market Radio LLC

☐ AFFECTS THIS DEBTOR

☐ AFFECTS GOLDEN STATE
BROADCASTING, LLC

☐ AFFECTS MAJOR MARKET RADIO LLC

☒ AFFECTS ALL DEBTORS

**DECLARATION OF EDWARD R. STOLZ
IN SUPPORT OF DEBTORS' REPLY TO
RECEIVER'S OPPOSITION TO
APPLICATION FOR ORDER
AUTHORIZING JOINTLY
ADMINISTERED DEBTORS TO EMPLOY
BANKRUPTCY ATTORNEYS UNDER A
GENERAL RETAINER
[HARRIS LAW PRACTICE LLC]**

Hearing Date: January 5, 2022

Hearing Time: 1:30 p.m.

EDWARD R. STOLZ, under penalty of perjury, declares and states as follows:

1. I am over the age of 18 years, am mentally competent and have personal knowledge of the matters set forth in this Declaration. If called upon as a witness, I could and would competently testify to these matters.

2. I am the President and sole shareholder of Royce International Broadcasting Corp., sole member of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market LLC, all Nevada limited liability companies which own certain FCC radio station licenses

1 identified under call signs KFRH-FM, KREV-FM, and KRCK-FM (collectively the "Radio
2 Stations"). I have owned and operated radio stations in California and Nevada for over 40 years.
3 I am not just an owner; I am also a broadcast engineer who has constructed many broadcasting
4 stations, from the ground up. In addition to installing, calibrating, operating, and maintaining
5 broadcast equipment to over the years, I have built each of these stations (KFRH, KREV and
6 KRCK) essentially from the ground up.

7 3. I have read the REPLY TO RECEIVER'S OPPOSITION TO APPLICATION
8 FOR ORDER AUTHORIZING JOINTLY ADMINISTERED DEBTORS TO EMPLOY
9 BANKRUPTCY ATTORNEYS UNDER A GENERAL RETAINER [HARRIS LAW
10 PRACTICE LLC] ("Reply") and attest that the facts stated therein are true and correct to the best
11 of my knowledge and belief.

12 4. I was shocked to learn that the Receiver appointed in the Civil Action, W.
13 Lawrence Patrick, is represented in these Chapter 11 cases by Fox Rothschild LLP even though
14 Fox Rothschild formerly represented the Debtors and other Defendants in the Civil Action.


15 5. Fox Rothschild LLP was appointed by the Civil Action Defendants' insurance
16 carrier to defend them in the Civil Action. In connection with the representation, Fox Rothschild
17 obtained confidential information from the Civil Action Defendants, including the Debtors, for
18 approximately three weeks in preparation for filing an answer to the Plaintiffs' complaint in the
19 Civil Action.

20 6. Before the answer could be completed and filed, Fox Rothschild advised the
21 insurance carrier that it could no longer represent the Civil Action Defendants because of an
22 alleged conflict of interest. As a result, the insurance carrier appointed other defense counsel to
23 represent the Civil Action Defendants.

24 7. I do not know the exact dates that Fox Rothschild represented the Civil Action
25 Defendants because that information was in my emails which the Receiver unlawfully took over
26 after he was appointed solely to administer the Debtors' Radio Stations for the purpose of paying
27 the Civil Action Judgment. However, the dates of Fox Rothschild's representation would have
28 been before the Defendants filed their answer in the Civil Action.

8. Fox Rothschild never contacted me, either in my individual capacity or as manager of the other Civil Action Defendants, to disclose that it was seeking to represent the Receiver in these Chapter 11 cases. I would have never consented to Fox Rothschild's representation of the Receiver because Fox Rothschild obtained confidential information about the Radio Stations, their operations, and the Civil Action Defendants.

DATED this 29th day of December 2021.


Edward R. Stolz